



# California Fair Political Practices Commission

August 14, 1986

Peter J. Walsh  
Attorney at Law  
P. O. Box 670  
Upland, CA 91785

Re: Your Request for Advice  
Our File No. A-86-253

Dear Mr. Walsh:

This is in response to your letter of July 28, 1986, with regard to the newly enacted "sponsored committee" provisions of the Political Reform Act (Government Code Sections 81000-91015). I hope the following information is helpful.

## FACTS

You state in your letter that you represent a group of inter-related partnerships and corporations which qualified as a "county major donor committee" during 1986.

## QUESTION

You have asked me to confirm my telephone advice of July 28, 1986, that the "sponsored committee" requirements set out in Government Code Section 84106 and FPPC regulation 2 Cal. Adm. Code Section 18419 (copy enclosed) apply only to recipient committees as defined in Government Code Section 82013(a) and not to major donor committees as defined in Section 82013(c).

## ANSWER

As I advised you, the sponsored committee provisions of the Act do not apply to individuals or entities which qualify as major donor committees. Government Code Section 82048.5, which defines the term "sponsored committee," states that a person sponsors a committee if any of the following apply:

1. The committee receives all or nearly all of its contributions from the person or its members, officers, employees or shareholders.
2. The person collects contributions for the committee by use of payroll deductions or dues from its members, officers or employees.

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3. The person, alone or in combination with other organizations, provides all or nearly all of the administrative services for the committee.
4. The person, alone or in combination with other organizations, sets the policies for soliciting contributions or making expenditures of committee funds.

Because each of the above criteria relate only to committees which receive contributions, the provisions requiring identification of a committee's sponsor are not applicable to major donor committees, which do not receive contributions.

I hope this information adequately responds to your concerns. Please do not hesitate to call me at (916) 322-5662 if you have additional questions.

Sincerely,

*Carla Wardlow*

Carla Wardlow  
Political Reform Consultant

Enclosure

A-86-253

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July 28, 1986

Fair Political Practices Commission  
428 "J" Street  
P. O. Box 807  
Sacramento, CA 95804

Attention: Carla Wardlow, Political Reform Consultant

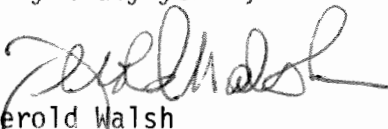
Subject: Confirmation of Application of Legislation Defining  
"Sponsored Committee"

Gentlemen:

On July 28, I spoke with Ms. Carla Wardlow, Consultant to the Fair Political Practices Commission, regarding the application of Section 82048.5 ("Sponsored Committee") of the Government Code and its concomitant provision in Section 84106 ("Identification of Sponsored Committee"). Ms. Wardlow verified to me that the provisions regarding sponsored committees deal with recipient committees as that term is identified in the Act and not with major donor committees.

I represent a major donor committee which comprises a group of inter-related partnerships and corporations which report as a major donor committee. According to the provisions of the 1985 amendments in the Act, this major donor committee, during 1986, qualifies as a "County major donor committee" and will report on that schedule. If you concur in my understanding of this provision of the law, please indicate your concurrence by executing the attached photocopy and returning it to me in the addressed, postpaid envelope. Thank you very much for your consideration in this matter.

Very truly yours,



Jerold Walsh

PJW:WC/900FP  
Attachment